

USDC- BALTIMORE  
'23 APR 11 PM 1:22

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

Kristine Michele Love

*(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)*

**-against-**

DJRD LLC

Toyota Financial Services

*(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)*

**Complaint for a Civil Case**

Case No. 23 cv 974  
*(to be filled in by the Clerk's Office)*

Jury Trial: ☐ Yes ☐ No  
*(check one)*

**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Kristine Michele Love
Street Address	2830 Southaven dr.
City and County	Annapolis, Anne arundel
State and Zip Code	Maryland, 21401
Telephone Number	240-726-5264
E-mail Address	krislove2830@gmail.com

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	DJRD LLC
Job or Title (if known)	
Street Address	6007 Eastern Ave.
City and County	Baltimore, Baltimore City
State and Zip Code	Maryland, 21224
Telephone Number	410-633-2200
E-mail Address (if known)	

Defendant No. 2

Name	Toyota Financial Services
Job or Title (if known)	
Street Address	6565 Headquarters Drive
City and County	Plano, Collin
State and Zip Code	Texas, 75024
Telephone Number	800-874-8822
E-mail Address (if known)	

Defendant No. 3

Name	
Job or Title (if known)	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address (if known)	

Defendant No. 4

Name	
Job or Title (if known)	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address (if known)	

*(If there are more than four defendants, attach an additional page providing the same information for each additional defendant.)*

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☒ Federal question

☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

12 CFR § 1026.23(b)(1), 16CFR § 433.1(i), 12 CFR § 1026.4, 12 CFR § 226.18

12 CFR § 1026.23 (d)(1)

**B. If the Basis for Jurisdiction Is Diversity of Citizenship**

## 1. The Plaintiff(s)

## a. If the plaintiff is an individual

The plaintiff, *(name)* Kristine Michele Love, is a citizen of the State of *(name)* Maryland.

## b. If the plaintiff is a corporation

The plaintiff, *(name)* \_\_\_\_\_, is incorporated under the laws of the State of *(name)* \_\_\_\_\_, and has its principal place of business in the State of *(name)* \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) \_\_\_\_\_, is a citizen of the State of (name) \_\_\_\_\_. Or is a citizen of (foreign nation) \_\_\_\_\_.

b. If the defendant is a corporation

The defendant, (name) DJRD LLC \_\_\_\_\_, is incorporated under the laws of the State of (name) Maryland \_\_\_\_\_, and has its principal place of business in the State of (name) Maryland \_\_\_\_\_. Or is incorporated under the laws of (foreign nation) \_\_\_\_\_, and has its principal place of business in (name) Maryland \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

The Amount the plaintiff owes me is \$70,000.00 from all of the trauma this has caused me.

---

Also with these Federal Codes, 12 CFR § 1026.23(b)(1), 16 CFR § 433.1(i),

---

12 CFR § 1026.4, 12 CFR § 226.18, 12 CFR § 1026.23(d)(1), 15 U.S.C 1666f

---

The defendant, (name) Toyota Financial Services, is incorporated under the laws of the state of Maryland, and has its principal place of business in the state of Maryland. Or is incorporated under the laws of \_\_\_\_\_, and has its principal place of business in Maryland.



### III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

My constitutional rights were violated because on June 20, 2022 I purchased a

2022 Toyota Camry XSE not knowing all of my rights as a consumer. I was forced to put a downpayment of \$5,000.00 down because of my credit and a shortage of cars.

I now know my rights and exercising my right of rescission pursuant.

On November 28, 2022 I have written evidence that I have tried to work this out

with DJRD LLC and Toyota Financial Services multiple times but both of these companies

are not willing to give me my consumer rights. I have attached all documents to this paper work.

#### IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages. For any request for injunctive relief, explain why monetary damages at a later time would not adequately compensate you for the injuries you sustained, are sustaining, or will sustain as a result of the events described above, or why such compensation could not be measured.

I would like \$1,000.00 for all of the damage and trauma that DJRD LLC and Toyota Financial Services

---

have caused me. The following 3.75% interest rate, each 711.95 that I have paid for since the fraudulent

---

car contract started. My \$5,000.00 back from the downpayment that I was told I had to have because of

---

my credit and a shortage of cars. The no cooling off period, I also demand my car title.

---



**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.


**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: April 11, 2023.

Signature of Plaintiff

Printed Name of Plaintiff

  
Kristine Love

*(If more than one plaintiff is named in the complaint, attach an additional certification and signature page for each additional plaintiff.)*

**B. For Attorneys**

Date of signing: \_\_\_\_\_, 20\_\_.

Signature of Attorney \_\_\_\_\_

Printed Name of Attorney \_\_\_\_\_

Bar Number \_\_\_\_\_

Name of Law Firm \_\_\_\_\_

Address \_\_\_\_\_

Telephone Number \_\_\_\_\_

Email Address \_\_\_\_\_